

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HANNIBAL WHEATLEY

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/24/2024

on behalf of himself and all others similarly situ

Write the full name of each plaintiff or petitioner.

Case No. 1:24 CV 07312

-against-

THE NEXT CHAPTER NY LLC

d/b/a TREEHOUSE

Write the full name of each defendant or respondent.

NOTICE OF MOTION

FOR EXTENSION OF TIME TO F

PLEASE TAKE NOTICE that

Defendant

plaintiff or defendant

The Next Chapter NY LLC

name of party who is making the motion

requests that the Court:

grant an extension of time to file a response to Plaintiff's Complaint. Defendant requests a 30-day extension, making the new deadline 11/23/2024.

1. The current deadline to respond to the Complaint is 10/23/2024.
2. Defendant is in the process of securing legal representation and requires additional time to properly respond to the claims made in the Complaint.
3. Defendant respectfully requests a 30-day extension, making the new deadline 11/23/2024.
4. This request is made in good faith and not for the purpose of delay.
5. Granting this Motion will not prejudice the Plaintiff.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☐ the following additional documents:

10/18/2024

Dated

Richard Rojas

Name

28 NY-59

Address

845-521-1062

Telephone Number (if available)



Signature

Prison Identification # (if incarcerated)

Nyack

NY

10960

City

State

Zip Code

ricky@treehousecannabis.com

E-mail Address (if available)

Application DENIED AS MOOT. Defendant's deadline to move against or answer the Complaint has already been stayed until **February 7, 2025** (the date of the initial pretrial conference.) *See* Notice of Initial Pretrial Conference, Dkt. 5.

Mr. Rojas is reminded that he cannot represent the company in court. *See Pridgen v. Andresen*, 113 F.3d 391, 393 (2d Cir. 1997) ("[I]t is well established that a layperson may not represent a corporation."). Defendant must be represented by counsel in advance of the initial pretrial conference and answer deadline.

SO ORDERED.

 10/24/2024

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE